

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	CASE 1:16 CR 329
	)	
-vs-	)	JUDGE SARA LIOI
	)	
EDWARD R. HILLS, <i>et al.</i> ,	)	<b>DEFENDANT SARI ALQSOUS'</b>
	)	<b>MOTION TO JOIN SUPPLEMENT</b>
	)	<b>TO DEFENDANTS' RESPONSE</b>
Defendants.	)	<b>TO GOVERNMENT'S OMNIBUS</b>
	)	<b>MOTION IN LIMINE FILED</b>
	)	<b>BY CODEFENDANT YAZAN</b>
	)	<b>AL-MADANI (ECF NO. 295)</b>

Defendant Sari Alqsous, through undersigned counsel, joins in the supplemental briefing filed by co-defendant Dr. Yazan Al-Madani (ECF No. 295), and in further response to the Government's Omnibus Motion in Limine (ECF No. 268). For all the reasons set forth in Dr. Al-Madani's supplemental filing, as well as the reasons previously argued in prior filings and orally on the record, Defendant Alqsous urges this Court to deny the Government's motion and to permit Defendants to argue that any referrals from MetroHealth System to Buckeye Dental Clinic during the relevant timeframe alleged in the indictment were legitimate medical and non-corrupt reasons as set forth in Defendants' filings.

Defendant Alqsous offers portions of the search warrant identified as sealed exhibits A and B in support of his motion, wherein the Government indicated that "a review of records supplied by Medicaid shows that approximately 200 different Medicaid-insured patients

(identified in Attachment C (Defendant Alqsous' Exhibit B to this supplemental filing to this motion)) who were first treated at MetroHealth Dental were subsequently at Buckeye.”

This evidence is highly relevant evidence going directly to intent and is not “good act evidence,” as argued by the Government and contemplated by case law.

Respectfully submitted,

/s/ John R. Mitchell

John R. Mitchell (OH 0066759)

Thompson Hine LLP

3900 Key Center

127 Public Square

Cleveland, OH 44114

O: 216.566.5847

F: 216.566.5800

[John.Mitchell@ThompsonHine.com](mailto:John.Mitchell@ThompsonHine.com)

/s/ Joseph R. Klammer

Joseph R. Klammer (OH 0068831)

The Klammer Law Office, Ltd.

The Historic Mentor Center Street School

7482 Center Street, Unit 6

Mentor, Ohio 44060

O: 440.974.8484

F: 440.255.6112

[jrklammer@klammlaw.com](mailto:jrklammer@klammlaw.com)

*Counsel for Defendant Sari Alqsous*

**CERTIFICATE OF SERVICE**

A copy of the foregoing *DEFENDANT SARI ALQSOUS' MOTION TO JOIN SUPPLEMENT TO DEFENDANTS' RESPONSE TO GOVERNMENT'S OMNIBUS MOTION IN LIMINE FILED BY CODEFENDANT YAZAN AL-MADANI (ECF NO. 295)* was served through the Court's electronic filing system this 19th day of June, 2018. Notice of this filing will be sent to the parties by operation of the Court's electronic filing system.

/s/ John R. Mitchell  
*Attorney for Sari Alqsous*